ENGINEER CERTIFICATION

I, Ted Tucker, do hereby certify that I personally prepared the foregoing technical analysis for KFMR and that I am qualified to do so.

My qualification as an FM engineer are a matter of record with the Commission. I have personally prepared and submitted nearly 100 applications, amendments, petitions, rulemaking proceedings, comments, replies, Special Temporary Authorizations, and other filings including domestic and international short spacing studies. I have personally installed and constructed numerous FM Stations, FM Translator Stations, Studio Transmitter Links, Low Power Televisions Stations and auxiliary transmitters. Many of these installations involved directional antenna systems.

I hold a valid General Class Radio Telephone License (formerly First Class) and have a Bachelor of Science degree from the University of Arizona.

Date: August 23, 1999 By: Ted Tucker

TECHNICAL ANALYSIS
KFMR CITY OF LICENSE CHANGE

Desert West Air Ranchers Corporation ("Desert"), permittee of FM Station KFMR, Winslow, Arizona, proposes to change the Community of License of FM Station KFMR from Winslow, Arizona to Sun City West, Arizona. The class and channel of operation would remain unchanged as a Class C facility on Channel 236. The proposed reference point for KFMR Channel 236C at Sun City West is fully spaced to all allocations and facilities except the unused Class C allocation at Yuma, Arizona whose reference point can be moved. The following is the technical analysis for the proposal.

1. KFMR AT CAMP VERDE

Desert had originally asked to the Commission to change the KFMR community of license from Winslow to Camp Verde using its existing site at Mormon Mountain. Due to the significant amount multipath interference throughout the Station's service area from that site, Desert has conducted an engineering analysis of the entire area. Such analysis revealed that there were no other sites suitable to Desert to serve Camp Verde. Therefore, Desert is asking the Commission to consider its instant request to allow for greater latitude in site selection.

2. KFMR AT SUN CITY WEST

KFMR is currently licensed to Winslow, Arizona as a Class C FM on Channel 236C from the Mormon Mountain Electronic Site near Flagstaff, Arizona. Desert proposes to change the KFMR Community of License to Sun City West, Arizona at the special reference point coordinates of:

34-16-35 N 112-07-30 W

Attached as EXHIBIT E1 is a channel spacing study showing the proposed KFMR special reference point for KFMR as a Class C FM at Sun City West, Arizona. The study shows that the proposal is fully spaced to all allocations and facilities except the unused Class C allocation at Yuma, Arizona. The allocation at Yuma will be discussed in the next section.

Attached as EXHIBIT E2 is the principal community and service contour calculations for KFMR operating at maximum Class C facilities of 100 KW at 600 meters from the special reference point. Included is a special 197 degree radial which transects the proposed community of license, Sun City West.

Attached as EXHIBIT E3 is the principal community and service contour map of KFMR operating at the maximum Class C facilities of 100 KW at 600 meters from the special reference point. The map shows that such a facility produces a city grade contour (70 dBu) over Sun City West. The point on the map depicting Sun City West is located at the southernmost point of the community. The map also contains shadowing information which shows that the facility has line of sight over the entire community of Sun City West. It should be noted that facilities less than maximum can also provide city service to the community.

Attached as EXHIBIT E4 is a gain/loss map showing the proposed 60 dBu coverage area of KFMR at Sun City West and the currently authorized 60 dBu coverage area of KFMR at Winslow, Arizona. The 1990 population within the proposed coverage area of KFMR at Sun City West is 1,534,453 persons. The 1990 population within the currently authorized coverage area of KFMR at Winslow, Arizona is 127,723 persons.

Attached as EXHIBIT E5 is a coverage map showing the remaining FM signals serving Winslow, Arizona and the loss area. There are also numerous AM stations including KINO, Winslow which service the area. KFMR operates at Mormon Mountain at a Class C FM. The are five other Class C FM stations, other than KFMR, operating at essentially the same with the same coverage as KFMR. They are: (1) KAFF FM, Flagstaff, Arizona; (2) KQST FM, Sedona, Arizona; (3) KVNA FM, Flagstaff, Arizona; (4) KMGN FM, Flagstaff, Arizona; and (5) KSED FM, Sedona, Arizona.

3. YUMA ALLOCATION

The KFMR proposal at Sun City West is short spaced to channel 236 Class C reserved for FM Station KTTI, Yuma, Arizona. Channel 236C was allotted to Yuma and reserved for KTTI's use in Docket 90-19 nearly 9 years ago. The current reference point for this allocation is:

32-40-22 N 114-20-13 W

The KTTI licensee at the time filed an application (File No. BPH-910910IH) which was granted that allowed KTTI to upgrade from 236C3 to 236C at the Bureau of Land Management site near Telegraph Pass. On August 6, 1996 the Commission canceled the authorization due to the licensee's failure to construct the station. The Class C allotment since has lain fallow for over three years. KTTI is currently operating as a Class C3. Desert realizes that KTTI has changed hands since that time and furthermore, Desert does not wish to preclude or hamper the current owners from upgrading KTTI.

However, in order to make way for a new First Local Service at Sun City West, Desert is requesting that the allocation reference point for the class C channel reserved for KTTI be moved to:

32-22-00 N 114-21-00 W

This move will not preclude KTTI from upgrading its facility to any class it desires including a Class C station as the following exhibits shall demonstrate. The previous KTTI construction permit for Class C operation (File No.BPH-910910IH) proposed facilities closely resembling Class C1 operation. This illustrates that full Class C operation may not even be possible, practical nor desirable from that site.

Attached as EXHIBIT E6 is a channel spacing study showing that KTTI could upgrade to a Class

C from the new Class C reference point proposed by Desert, located south of Yuma, without regard to the KFMR proposal.

Attached as EXHIBIT E7A is a channel spacing study showing that KTTI could upgrade to a Class C1 from its current Class C reference point without regard to the KFMR proposal. And attached as EXHIBIT E7B is a channel spacing study showing that KTTI could upgrade to a Class C1 from its current current operating site under the United States-Mexican FM Broadcasting Agreement without regard to the KFMR proposal.
Attached as EXHIBIT E7C is a contour map showing that KTTI could operate as a full Class C1 from its existing site with respect to the Class B allocation at Tecate, Mexico.

Attached as EXHIBIT E8A is a channel spacing study showing that KTTI could upgrade to a Class C2 from its current Class C reference point without regard to the KFMR proposal. And attached as EXHIBIT E8B is a channel spacing study showing that KTTI could upgrade to a Class C2 from its current current operating site without regard to the KFMR proposal.

Attached as EXHIBIT E9 is a gain/loss map for KTTI for full Class C operation from its current reference point and the proposed reference point. The population within the 60 dBu contour of KTTI at its current Class C reference point with maximum facilities is 110,648 persons as compared to 109,122 person within the 60 dBu contour of KTTI at the proposed Class C reference point with maximum facilities.

Attached as EXHIBIT E10 is a channel spacing study showing that KTTI could upgrade to a Class C from its current Class C reference point utilizing 73.215 spacing with regard to the KFMR proposal. The previous KTTI construction permit for Class C operation (File No.BPH-910910IH) proposed facilities much less than full Class C facilities which more closely resembled Class C1 operation. Again, this illustrates that full Class C operation may not even be possible, practical nor desirable from that site. In addition, the area in the direction of the protected spacing is almost completely barren desert.

4. ALTERNATIVE PROPOSAL

In the event that the Commission finds that it is not inclined to change the reference point of the current Yuma Class C allocation, then Desert is alternatively proposing that KFMR change its community of license to Mayer, Arizona without change of class or channel. The allotment of Channel 236 as a Class C at Mayer, Arizona would be from a fully spaced reference point which can provide both city grade coverage and line of sight over Mayer. The special reference point coordinates are:

34-25-00 N 112-00-30 W

Attached as EXHIBIT E11 is a channel spacing study showing the proposed KFMR special reference point for KFMR as a Class C FM at Mayer, Arizona. The study shows that the proposal is fully spaced to all allocations and facilities without exception.
Attached as EXHIBIT E12 is the principle community and service contour calculations for KFMR operating at the maximum Class C facilities of 100 KW at 600 meters from the special reference point. Included is a special 265 degree radial which transects the proposed community

of license, Mayer.

Attached as EXHIBIT E13 is the principle community and service contour map of KFMR operating at maximum Class C facilities of 100 KW at 600 meters from the special reference point. The map shows that such a facility clearly produces a city grade contour (70 dBu) over Mayer. The map also contains shadowing information which shows that the facility has line of sight over the entire community of Mayer.

Attached as EXHIBIT E14 is a gain/loss map showing the proposed coverage area of KFMR at Mayer and the currently authorized coverage area of KFMR at Winslow, Arizona. The 1990 population within the proposed coverage area of KFMR at Mayer is 663,412 persons. The 1990 population within the currently authorized coverage area of KFMR at Winslow, Arizona is 127,723 persons. The stations which will continue to provide service to the loss area have previously been discussed.

Note: All exhibits, contours, spacing studies and population estimates were prepared in accordance with FCC rules and regulations using RadioSoft FMR software and SoftWright Terrain Analysis Package software.

EXHIBIT E1

MAPFM search of channel 236C (95.1 MHz), at N. 34 16 35, W. 112 7 30.

SUN CITY WEST, ARIZONA
CLASS C REFERENCE POINT
CLASS C OPERATION

Searching Channel 236C (95.1 MHz):

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE
ALC	Phoenix	AZ	233	C	U	104.7	105.0	176.8°	-0.3
KOOLFM	Phoenix	AZ	233	C	L	104.7	105.0	176.8°	-0.3
ALC	Tucson	AZ	235	C	U	243.7	241.0	157.3°	2.7
K235AI	Mayer	AZ	235	D	C	22.8	0.0	258.1°	22.8
KMXZFM	Tucson	AZ	235	C	L	243.7	241.0	157.3°	2.7
FA	Winslow	AZ	236	C	D	154.9	290.0	57.6°	-135.1
KTTI	Yuma	AZ	236	C3	L	291.8	237.0	233.5°	54.8
ALC	Winslow	AZ	236	C	U	154.9	290.0	57.6°	-135.1
KFMR	Winslow	AZ	236	C	C	95.4	290.0	36.4°	-194.6
ALC	Yuma	AZ	236	C	U	271.9	290.0	229.1°	-18.1
KFMR	Camp Verde	AZ	236	C	A	95.3	290.0	36.4°	-194.7
K237AU	Prescott	AZ	237	D	L	44.7	0.0	301.9°	44.7
KYOTFM	Phoenix	AZ	238	C	L	104.6	105.0	176.7°	-0.4
ALC	Phoenix	AZ	238	C	U	104.6	105.0	176.7°	-0.4
ALC	Cottonwood	AZ	289	C3	U	45.6	31.0	0.9°	14.6
KVRDFM	Cottonwood	AZ	289	C3	L	45.5	31.0	1.0°	14.5
KHOTFM	Paradise Valley	AZ	290	C2	C	83.5	35.0	156.2°	48.5
ALC	Paradise Valley	AZ	290	C2	U	73.3	35.0	169.4°	38.3
KHOTFM	Paradise Valley	AZ	290	C3	L	83.5	31.0	156.2°	52.5

NEW CLASS C REFERENCE POINT

ALC	Yuma	AZ	236	C	296.2	290.0	224.4°	6.2 CLEAR

KTTI AS CLASS C1 FROM EXISTING CLASS C REFERENCE POINT

KTTI	Yuma	AZ	236	C1	271.8	270.0	229.1°	1.8 CLEAR

KTTI AS CLASS C2 FROM EXISTING CLASS C REFERENCE POINT

KTTI	Yuma	AZ	236	C2	271.8	249.0	229.1°	22.8 CLEAR

EXHIBIT E2

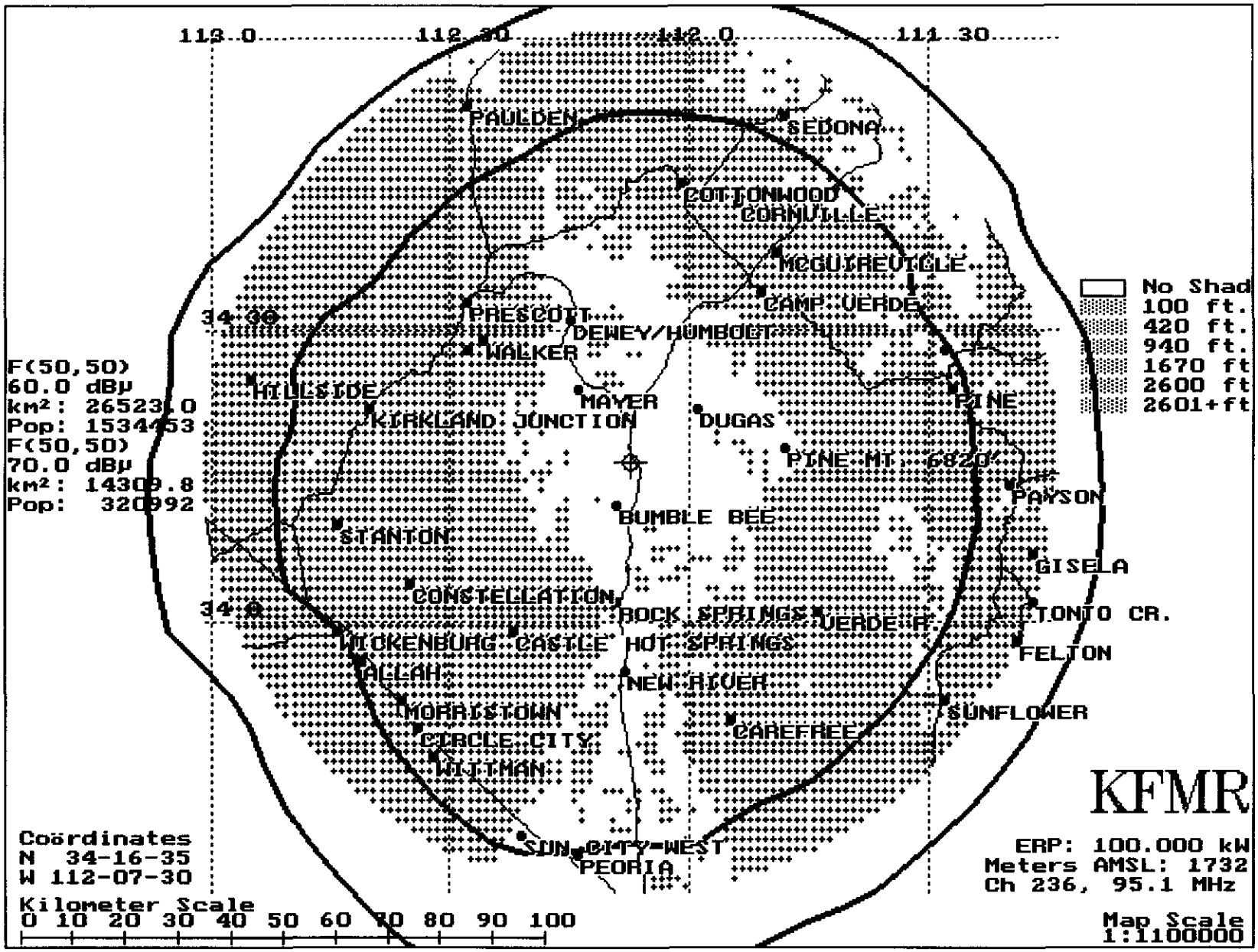
COMPUTED DISTANCE TO CONTOURS (PART 73)

SUN CITY WEST, ARIZONA
CLASS C REFERENCE POINT

Transmitter Latitude: 34:16:35.0N Longitude: 112:07:30.0W
Transmitter center of radiation: 1732.0 m AMSL (622.00 m AGL)
Power: 100.000 kW Channel 236

Azimuth (Deg T)	HAAT (m)	Horizontal Relative Field	Equiv Power	Rough Correct	f(50,50) 60.0 dBu (km)	f(50,50) 70.0 dBu (km)
.00	568.25	1.000	100.000	.000	90.53	66.30
45.00	566.24	1.000	100.000	.000	90.44	66.20
90.00	569.75	1.000	100.000	.000	90.60	66.37
135.00	624.33	1.000	100.000	.000	92.74	68.61
180.00	756.25	1.000	100.000	.000	97.87	73.34
197.00	915.06	1.000	100.000	.000	103.58	77.73
225.00	641.05	1.000	100.000	.000	93.38	69.24
270.00	604.28	1.000	100.000	.000	91.98	67.84
315.00	468.32	1.000	100.000	.000	84.72	60.17

	599.81 m	Cardinal Average				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112.0
111.30
34.30
PAULDEN
SEDONA
COTTONWOOD
CORNVILLE
MCGUIREVILLE
CAMP VERDE
PRESCOTT
DEWEY/HUMBOLDT
WALKER
HILLSIDE
MAYER
KIRKLAND JUNCTION
DUGAS
PINE
PINE MT. 6820'
PAYSON
BUMBLE BEE
STANTON
GISELA
CONSTELLATION
34.0
ROCK SPRINGS
VERDE R.
TONTO CR.
WICKENBURG
CASTLE HOT SPRINGS
FELTON
ALLAH
NEW RIVER
MORRISTOWN
SUNFLOWER
CAREFREE
CIRCLE CITY
WITTMAN
SUN CITY-WEST
PEORIA
F(50,50)
60.0 dBµ
km²: 26523.0
Pop: 1534453
F(50,50)
70.0 dBµ
km²: 14309.8
Pop: 320992
No Shad
100 ft.
420 ft.
940 ft.
1670 ft
2600 ft
2601+ft
KFMR
Coördinates
N 34-16-35
W 112-07-30
Kilometer Scale
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ERP: 100.000 kW
Meters AMSL: 1732
Ch 236, 95.1 MHz
Map Scale
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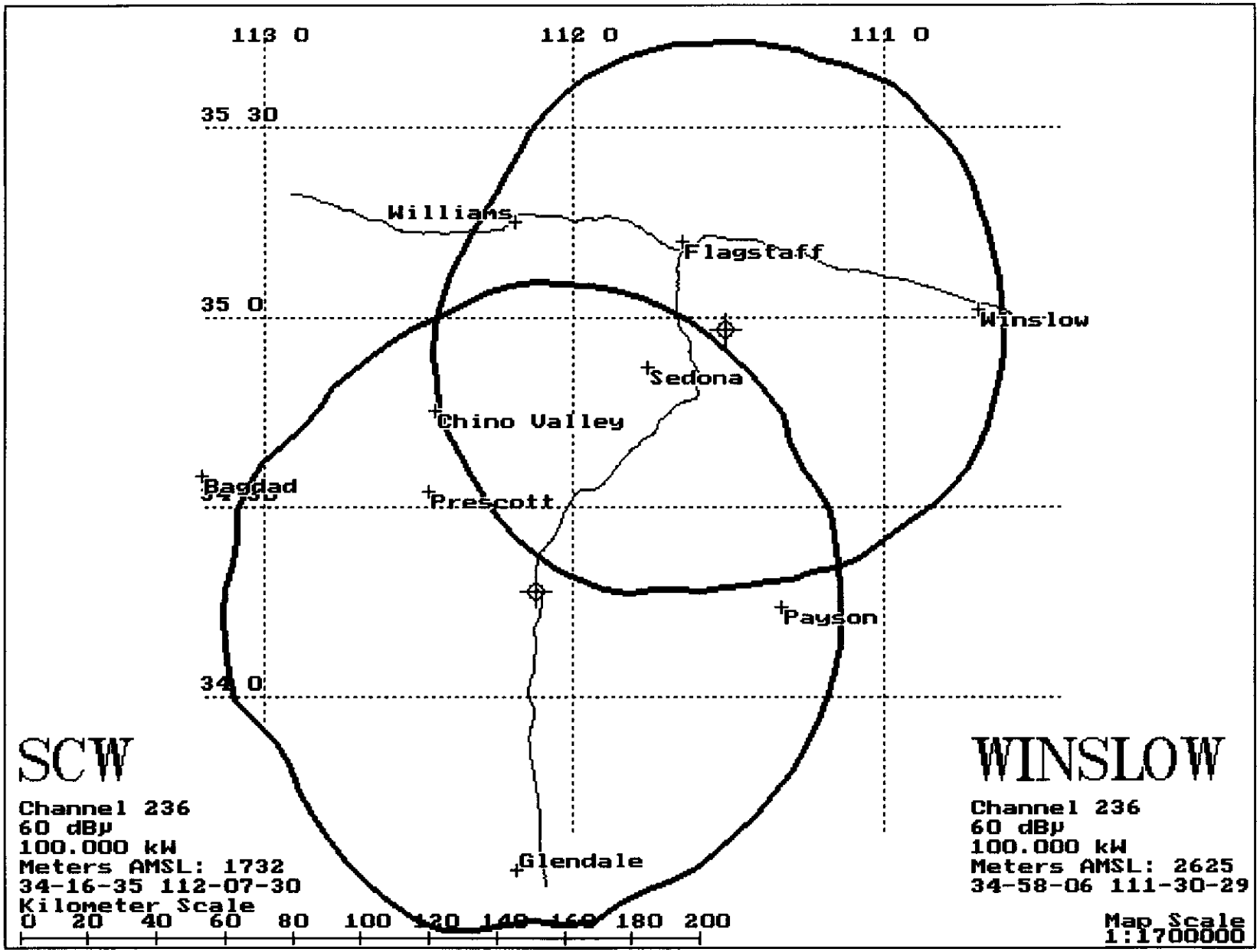
EXHIBIT E3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111 0
35 30
35 0
34 30
34 0
Williams
Flagstaff
Winslow
Sedona
Chino Valley
Baggad
Prescott
Payson
Glendale
SCW
Channel 236
60 dBµ
100.000 kW
Meters AMSL: 1732
34-16-35 112-07-30
Kilometer Scale
0 20 40 60 80 100 120 140 160 180 200
WINSLOW
Channel 236
60 dBµ
100.000 kW
Meters AMSL: 2625
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Map Scale
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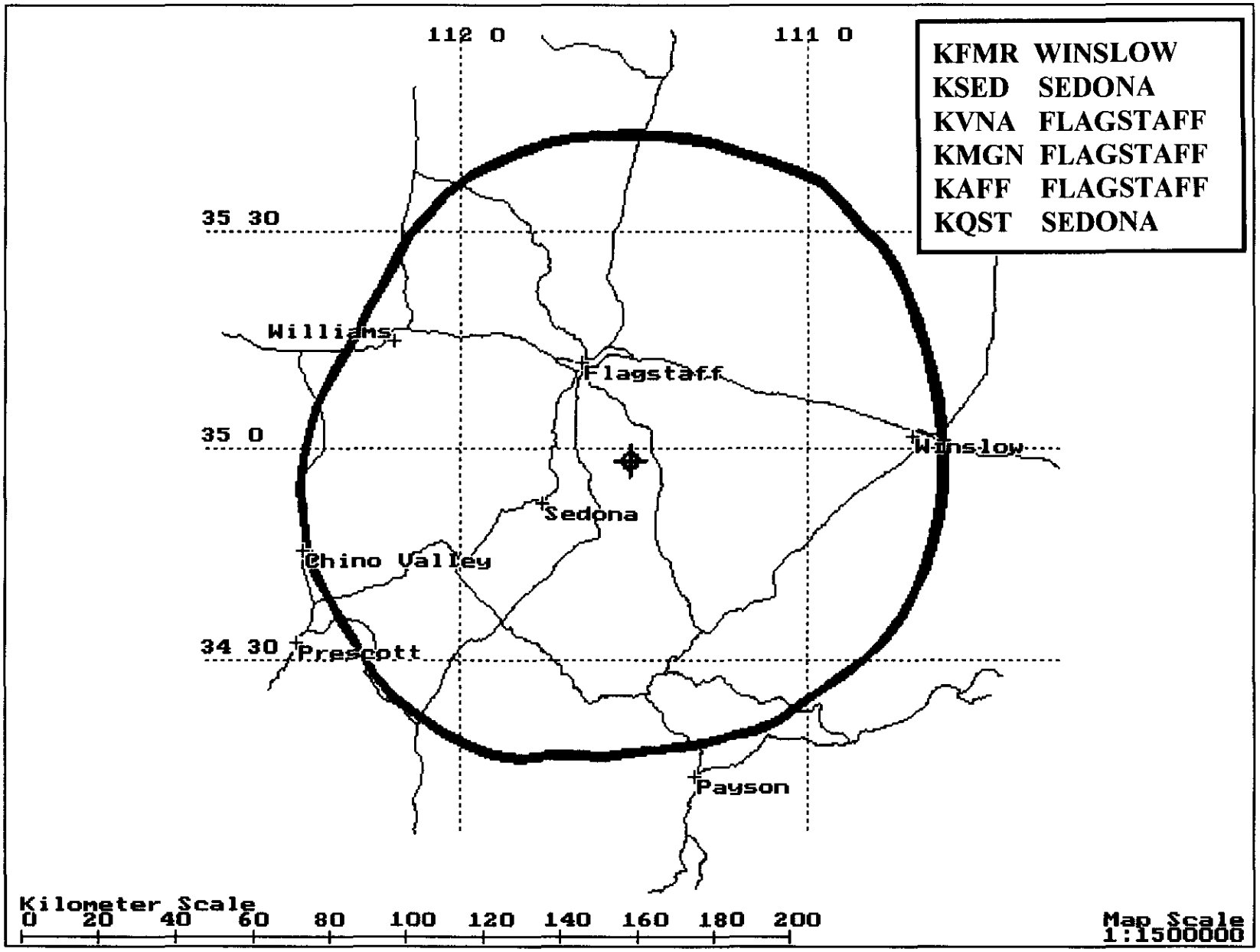
EXHIBIT E4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35 0
34 30
KFMR WINSLOW
KSED SEDONA
KVNA FLAGSTAFF
KMGN FLAGSTAFF
KAFF FLAGSTAFF
KQST SEDONA
Williams
Flagstaff
Winslow
Sedona
Chino Valley
Prescott
Payson
Kilometer Scale
0 20 40 60 80 100 120 140 160 180 200
Map Scale
1:1500000

EXHIBIT E5

EXHIBIT E6

MAPFM search of channel 236C (95.1 MHz), at N. 32 22 0, W. 114 21 0.

YUMA, ARIZONA
NEW CLASS C REFERENCE POINT
CLASS C OPERATION

Searching Channel 236C (95.1 MHz):

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE	
ALC	Brawley	CA	233	B	U	121.8	105.0	293.7°	16.8	
KWST	Brawley	CA	233	B	L	121.8	105.0	293.7°	16.8	
ALC	San Felipe	BN	234	B		155.7	98.0	197.1°	57.7	
KBZT	San Diego	CA	235	B	L	277.1	217.0	280.9°	60.1	
ALC	San Diego	CA	235	B	U	277.1	217.0	280.9°	60.1	
ALC	Tucson	AZ	235	C	U	304.8	241.0	92.5°	63.8	
KMXZFM	Tucson	AZ	235	C	L	304.8	241.0	92.5°	63.8	
KTTI	Yuma	AZ	236	C3	L	47.5	237.0	323.7°	-189.5	
KFRG	San Bernardino	CA	236	B	L	340.6	274.0	306.6°	66.6	
ALC	Yuma	AZ	236	C	U	34.0	290.0	2.1°	-256.0	
ALC	San Bernardino	CA	236	B	U	340.6	274.0	306.6°	66.6	
ALC	San Quintin	BN	236	B		270.8	270.0	215.4°	0.8	
ALC	Tecate	BN	237	B		216.5	215.0	275.6°	1.5	
ALC	Caborca	SO	237	C		278.5	228.0	131.2°	50.5	
ALC	San Felipe	BN	238	B		155.7	98.0	197.1°	57.7	
ALC	Sonoita	SO	239	A		165.8	94.0	109.2°	71.8	
PRORM	Sun City West	AZ	236	C		296.2	290.0	44.4°	6.2	CLEAR

EXHIBIT E7A

MAPFM search of channel 236C1 (95.1 MHz), at N. 32 40 22, W. 114 20 13.

YUMA, ARIZONA
EXISTING CLASS C REFERENCE POINT
CLASS C1 OPERATION

Searching Channel 236C1 (95.1 MHz):

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE	
ALC	Brawley	CA	233	B	U	113.6	79.0	277.6°	34.6	
KWST	Brawley	CA	233	B	L	113.6	79.0	277.6°	34.6	
KBZT	San Diego	CA	235	B	L	273.5	195.0	273.9°	78.5	
ALC	San Diego	CA	235	B	U	273.5	195.0	273.9°	78.5	
KTTI	Yuma	AZ	236	C3	L	29.6	211.0	278.4°	-181.4	
KFRG	San Bernardino	CA	236	B	L	322.2	270.0	301.7°	52.2	
ALC	Yuma	AZ	236	C	U	0.0	270.0	0.0°	-270.0	
ALC	San Bernardino	CA	236	B	U	322.2	270.0	301.7°	52.2	
ALC	San Quintin	BN	236	B		299.8	270.0	211.9°	29.8	
ALC	Tecate	BN	237	B		217.1	195.0	266.6°	22.1	
PRORM	Sun City West	AZ	236	C		271.8	270.0	49.1°	1.8	CLEAR

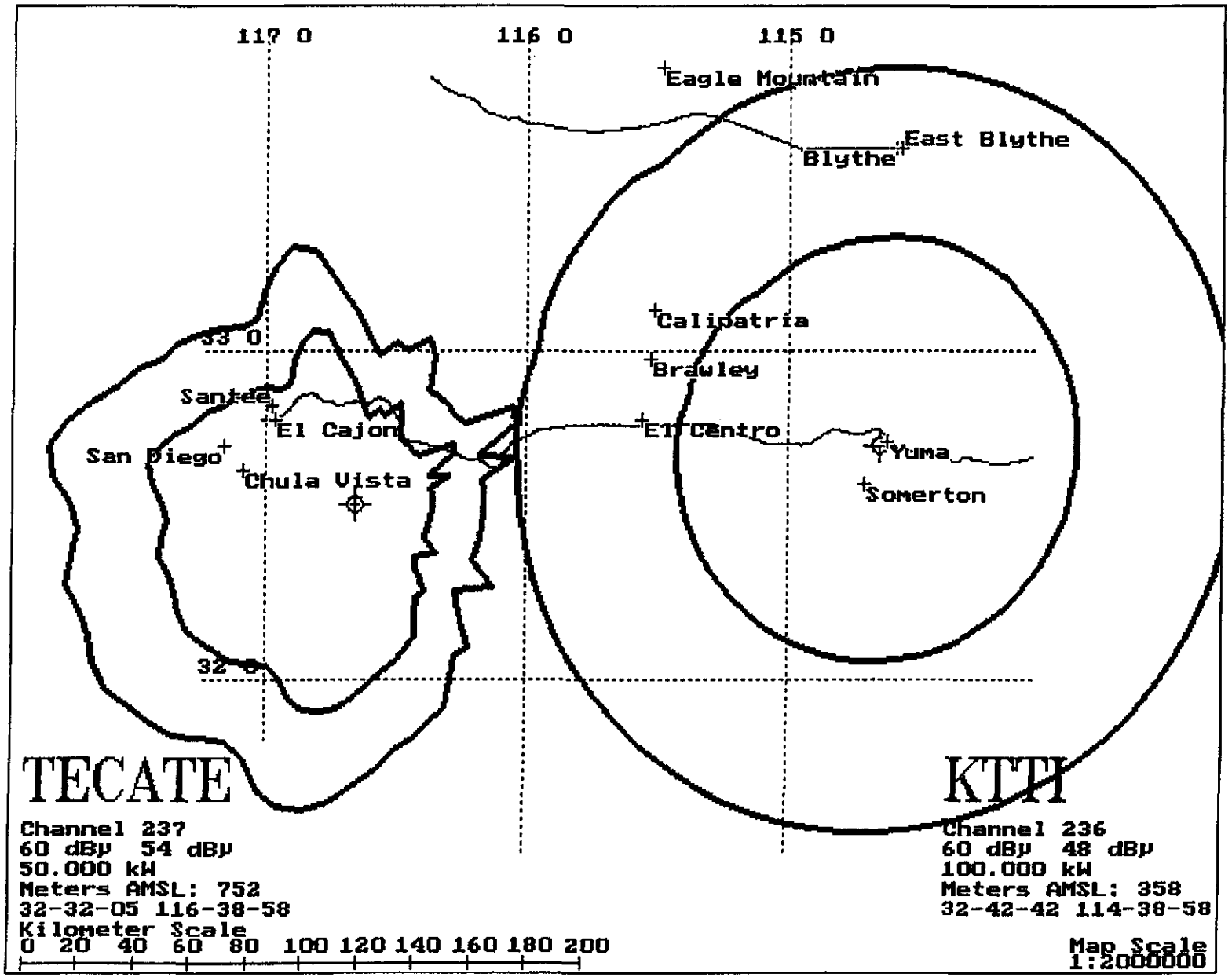
EXHIBIT E7B

MAPFM search of channel 236C1 (95.1 MHz), at N. 32 42 42, W. 114 38 58.

YUMA, ARIZONA
KTTI EXISTING OPERATING SITE
CLASS C1 OPERATION

Searching Channel 236C1 (95.1 MHz), from the site of KTTI:

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE	
ALC	Brawley	CA	233	B	U	84.0	79.0	277.3°	5.0	
KWST	Brawley	CA	233	B	L	84.0	79.0	277.3°	5.0	
KBZT	San Diego	CA	235	B	L	244.0	195.0	273.3°	49.0	
ALC	San Diego	CA	235	B	U	244.0	195.0	273.3°	49.0	
KTTI	Yuma	AZ	236	C3	L	0.0	211.0	0.0°	-211.0	
KFRG	San Bernardino	CA	236	B	L	295.4	270.0	303.9°	25.4	
ALC	Yuma	AZ	236	C	U	29.6	270.0	98.4°	-240.4	
ALC	San Bernardino	CA	236	B	U	295.4	270.0	303.9°	25.4	
ALC	San Quintin	BN	236	B		289.4	270.0	206.3°	19.4	
ALC	Tecate	BN	237	B		188.3	195.0	264.5°	-6.7	
ALC	Mexicali	BN	290	A		75.1	21.0	266.4°	54.1	
XHSUFM	Mexicali	BN	290	A		75.1	21.0	266.4°	54.1	
PRORM	Sun City West	AZ	236	C		291.8	270.0	53.5°	21.8	CLEAR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116 0
115 0
Eagle Mountain
East Blythe
Blythe
Calipatria
33 0
Brawley
Santee
El Cajon
El Centro
Yuma
San Diego
Chula Vista
Somerton
32 0
TECATE
KTTH
Channel 237
60 dBµ 54 dBµ
50.000 kW
Meters AMSL: 752
32-32-05 116-38-58
Channel 236
60 dBµ 48 dBµ
100.000 kW
Meters AMSL: 358
32-42-42 114-38-58
Kilometer Scale
0 20 40 60 80 100 120 140 160 180 200
Map Scale
1:2000000

EXHIBIT E7C

EXHIBIT E8A

MAPFM search of channel 236C2 (95.1 MHz), at N. 32 40 22, W. 114 20 13.

YUMA, ARIZONA
EXISTING CLASS C REFERENCE POINT
CLASS C2 OPERATION

Searching Channel 236C2 (95.1 MHz):

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE	
ALC	Brawley	CA	233	B	U	113.6	74.0	277.6°	39.6	
KWST	Brawley	CA	233	B	L	113.6	74.0	277.6°	39.6	
KTTI	Yuma	AZ	236	C3	L	29.6	177.0	278.4°	-147.4	
ALC	Yuma	AZ	236	C	U	0.0	249.0	0.0°	-249.0	
ALC	San Quintin	BN	236	B		299.8	237.0	211.9°	62.8	
ALC	Tecate	BN	237	B		217.1	164.0	266.6°	53.1	
PRORM	Sun City West	AZ	236	C		271.8	249.0	49.1°	22.8	CLEAR

EXHIBIT E8B

MAPFM search of channel 236C2 (95.1 MHz), at N. 32 42 42, W. 114 38 58.

YUMA, ARIZONA
KTTI EXISTING OPERATING SITE
CLASS C2 OPERATION

Searching Channel 236C2 (95.1 MHz):

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE
ALC	Brawley	CA	233	B	U	84.0	74.0	277.3°	10.0
KWST	Brawley	CA	233	B	L	84.0	74.0	277.3°	10.0
KBZT	San Diego	CA	235	B	L	244.0	169.0	273.3°	75.0
ALC	San Diego	CA	235	B	U	244.0	169.0	273.3°	75.0
KTTI	Yuma	AZ	236	C3	L	0.0	177.0	0.0°	-177.0
KFRG	San Bernardino	CA	236	B	L	295.4	241.0	303.9°	54.4
ALC	Yuma	AZ	236	C	U	29.6	249.0	98.4°	-219.4
ALC	San Bernardino	CA	236	B	U	295.4	241.0	303.9°	54.4
ALC	San Quintin	BN	236	B		289.4	237.0	206.3°	52.4
ALC	Tecate	BN	237	B		188.3	164.0	264.5°	24.3
ALC	Mexicali	BN	290	A		75.1	14.0	266.4°	61.1
XHSUFM	Mexicali	BN	290	A		75.1	14.0	266.4°	61.1
PRORM	Sun City West	AZ	236	C		291.8	249.0	53.5°	42.8 CLEAR

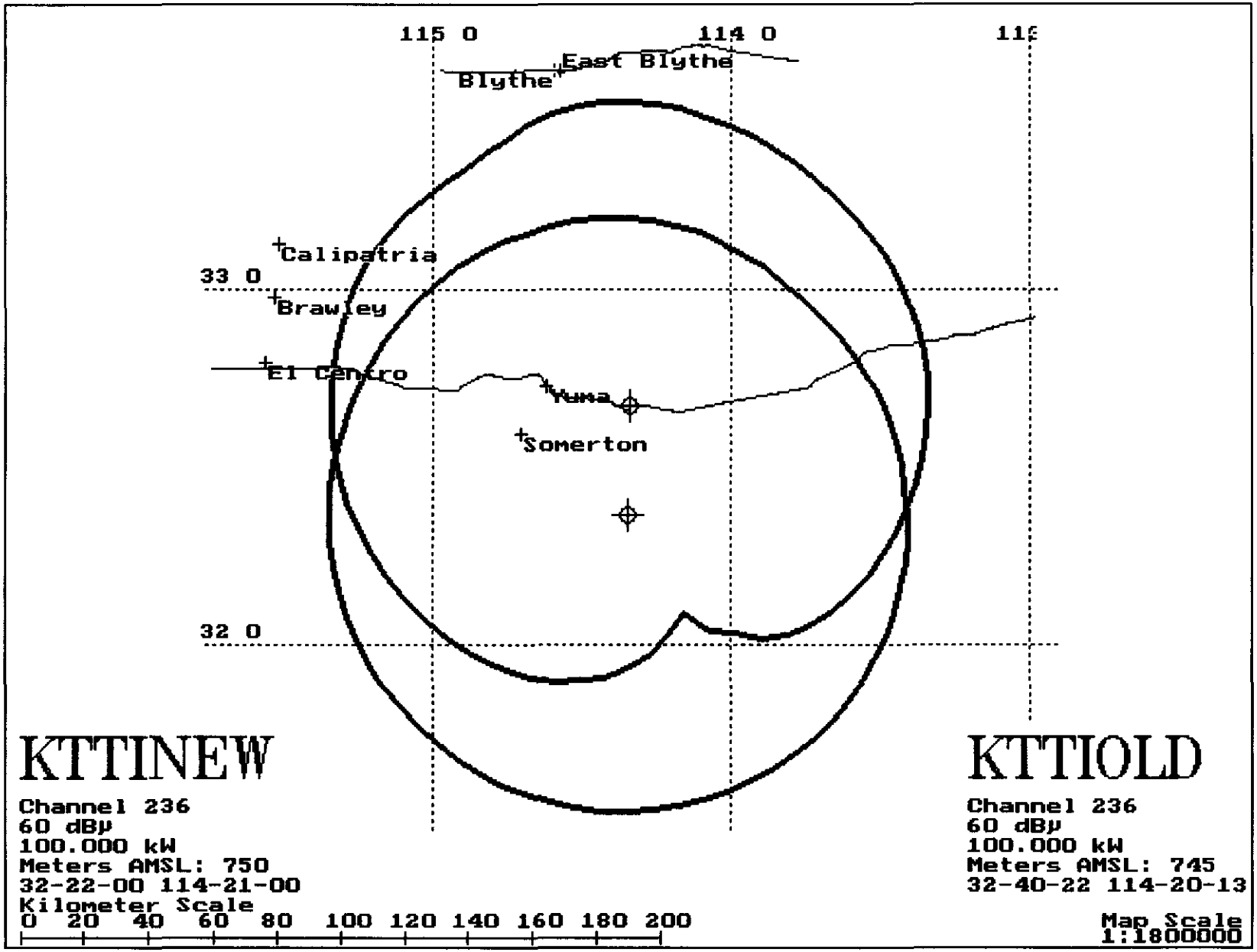
115 0
114 0
East Blythe
Blythe
Calipatria
33 0
Brawley
El Centro
Yuma
Somerton
32 0
KTTINEW
Channel 236
60 dBµ
100.000 kW
Meters AMSL: 750
32-22-00 114-21-00
KTTIOLD
Channel 236
60 dBµ
100.000 kW
Meters AMSL: 745
32-40-22 114-20-13
Kilometer Scale
0 20 40 60 80 100 120 140 160 180 200
Map Scale
1:1800000

EXHIBIT E9

EXHIBIT E10

MAPFM search of channel 236C (95.1 MHz), at N. 32 40 22, W. 114 20 13.

YUMA, ARIZONA
NEW CLASS C REFERENCE POINT
CLASS C OPERATION

Searching Channel 236C (95.1 MHz):

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE
ALC	Brawley	CA	233	B	U	113.6	105.0	277.6°	8.6
KWST	Brawley	CA	233	B	L	113.6	105.0	277.6°	8.6
KBZT	San Diego	CA	235	B	L	273.5	217.0	273.9°	56.5
ALC	San Diego	CA	235	B	U	273.5	217.0	273.9°	56.5
ALC	Tucson	AZ	235	C	U	306.4	241.0	98.8°	65.4
KMXZFM	Tucson	AZ	235	C	L	306.4	241.0	98.8°	65.4
KTTI	Yuma	AZ	236	C3	L	29.6	237.0	278.4°	-207.4
KFRG	San Bernardino	CA	236	B	L	322.2	274.0	301.7°	48.2
KFMR	Winslow	AZ	236	C	C	365.3	290.0	45.8°	75.3
ALC	Yuma	AZ	236	C	U	0.0	290.0	0.0°	-290.0
ALC	San Bernardino	CA	236	B	U	322.2	274.0	301.7°	48.2
KFMR	Camp Verde	AZ	236	C	A	365.2	290.0	45.8°	75.2
ALC	San Quintin	BN	236	B		299.8	270.0	211.9°	29.8
ALC	Tecate	BN	237	B		217.1	215.0	266.6°	2.1
ALC	Caborca	SO	237	C		301.2	228.0	136.2°	73.2
ALC	Mexicali	BN	290	A		104.2	28.0	269.9°	76.2
XHSUFM	Mexicali	BN	290	A		104.2	28.0	269.9°	76.2

CLASS C UNDER 73.215 SPACING

PRORM	Sun City West	AZ	236	C		271.8	270.0	49.1°	1.8 CLEAR

EXHIBIT E11

MAPFM search of channel 236C (95.1 MHz), at N. 34 25 0, W. 112 0 30.

KFMR MAYER, ARIZONA
CLASS C REFERENCE POINT

Searching Channel 236C (95.1 MHz):

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE
ALC	Phoenix	AZ	233	C	U	120.2	105.0	182.4°	15.2
KOOLFM	Phoenix	AZ	233	C	L	120.2	105.0	182.4°	15.2
ALC	Tucson	AZ	235	C	U	254.4	241.0	160.9°	13.4
K235AI	Mayer	AZ	235	D	C	38.7	0.0	238.5°	38.7
KMXZFM	Tucson	AZ	235	C	L	254.4	241.0	160.9°	13.4
FA	Winslow	AZ	236	C	D	137.7	290.0	60.6°	-152.3
KTTI	Yuma	AZ	236	C3	L	309.7	237.0	232.4°	72.7
ALC	Winslow	AZ	236	C	U	137.7	290.0	60.6°	-152.3
KFMR	Winslow	AZ	236	C	C	76.5	290.0	36.8°	-213.5
ALC	Yuma	AZ	236	C	U	290.1	290.0	228.2°	0.1
KFMR	Camp Verde	AZ	236	C	A	76.4	290.0	36.8°	-213.6
K237AU	Prescott	AZ	237	D	L	49.3	0.0	279.4°	49.3
KYOTFM	Phoenix	AZ	238	C	L	120.1	105.0	182.3°	15.1
ALC	Phoenix	AZ	238	C	U	120.1	105.0	182.3°	15.1
ALC	Cottonwood	AZ	289	C3	U	31.7	31.0	341.6°	0.7
KVRDFM	Cottonwood	AZ	289	C3	L	31.5	31.0	341.7°	0.5
KHOTFM	Paradise Valley	AZ	290	C2	C	94.7	35.0	166.0°	59.7
ALC	Paradise Valley	AZ	290	C2	U	87.7	35.0	178.3°	52.7
KHOTFM	Paradise Valley	AZ	290	C3	L	94.7	31.0	166.0°	63.7

EXHIBIT E12

COMPUTED DISTANCE TO CONTOURS (PART 73)

MAYER, ARIZONA
CLASS C REFERENCE POINT

Transmitter Latitude: 34:25:00.0N Longitude: 112:00:30.0W
Transmitter center of radiation: 1939.0 m AMSL (600.00 m AGL)
Power: 100.000 kW Channel 236

Azimuth (Deg T)	HAAT (m)	Horizontal Relative Field	Equiv Power	Rough Correct	f(50,50) 60.0 dBu (km)	f(50,50) 70.0 dBu (km)
.00	500.96	1.000	100.000	.000	86.78	62.25
45.00	427.76	1.000	100.000	.000	81.81	57.81
90.00	434.66	1.000	100.000	.000	82.31	58.20
135.00	580.74	1.000	100.000	.000	91.06	66.87
180.00	714.49	1.000	100.000	.000	96.23	71.92
225.00	789.27	1.000	100.000	.000	99.16	74.40
265.00	725.66	1.000	100.000	.000	96.67	72.31
270.00	724.25	1.000	100.000	.000	96.61	72.26
315.00	626.45	1.000	100.000	.000	92.82	68.69

599.82 m Cardinal Average

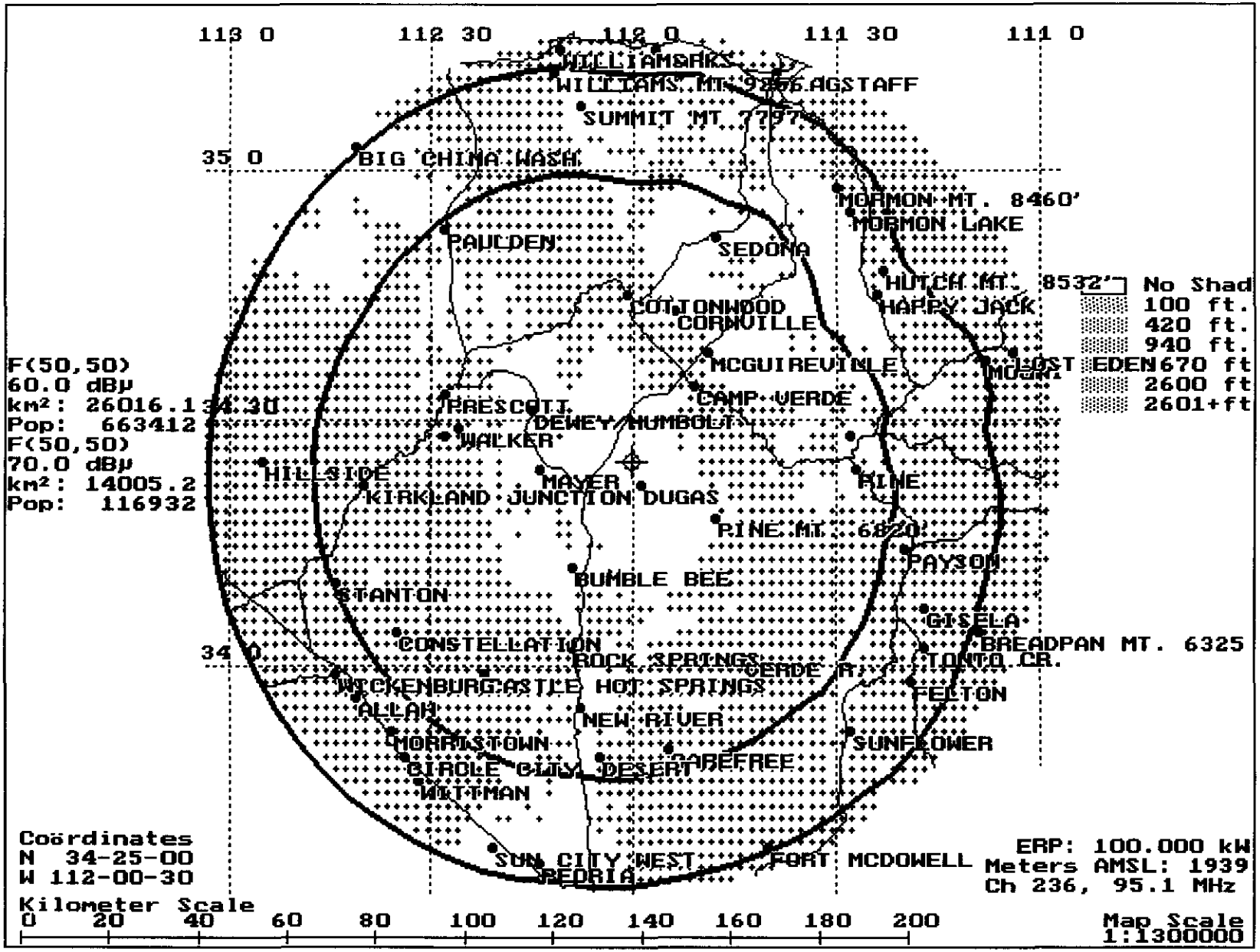
113 0
112 30
112 0
111 30
111 0
35 0
34 30
34 0
WILLIAMSARK
WILLIAMS MT. 9266
AGSTAFF
SUMMIT MT. 7797'
BIG CHINA WASH
MORMON MT. 8460'
MORMON LAKE
PAULDEN
SEDONA
HUTCH MT. 8532'
COTTONWOOD
CORNVILLE
HAPPY JACK
No Shad
100 ft.
420 ft.
940 ft.
EDEN 670 ft
2600 ft
2601+ft
MCGUIREVILLE
CAMP VERDE
PRESCOTT
DEWEY HUMBOLT
WALKER
HILLSIDE
MAYER
KIRKLAND JUNCTION
DUGAS
RINE
RINE MT. 6820'
PAYSON
BUMBLE BEE
STANTON
GISELA
CONSTELLATION
ROCK SPRINGS
BREADPAN MT. 6325
TONTO CR.
WICKENBURG
CASTLE HOT SPRINGS
FELTON
ALLAH
NEW RIVER
MORRISTOWN
SUNFLOWER
CIRCLE CITY
DESERT HAREFREE
WITTMAN
SUN CITY WEST
FORT MCDOWELL
PEORIA
F(50,50)
60.0 dBµ
km²: 26016.1
Pop: 663412
F(50,50)
70.0 dBµ
km²: 14005.2
Pop: 116932
Coordinates
N 34-25-00
W 112-00-30
ERP: 100.000 kW
Meters AMSL: 1939
Ch 236, 95.1 MHz
Kilometer Scale
0 20 40 60 80 100 120 140 160 180 200
Map Scale
1:1300000

EXHIBIT E13

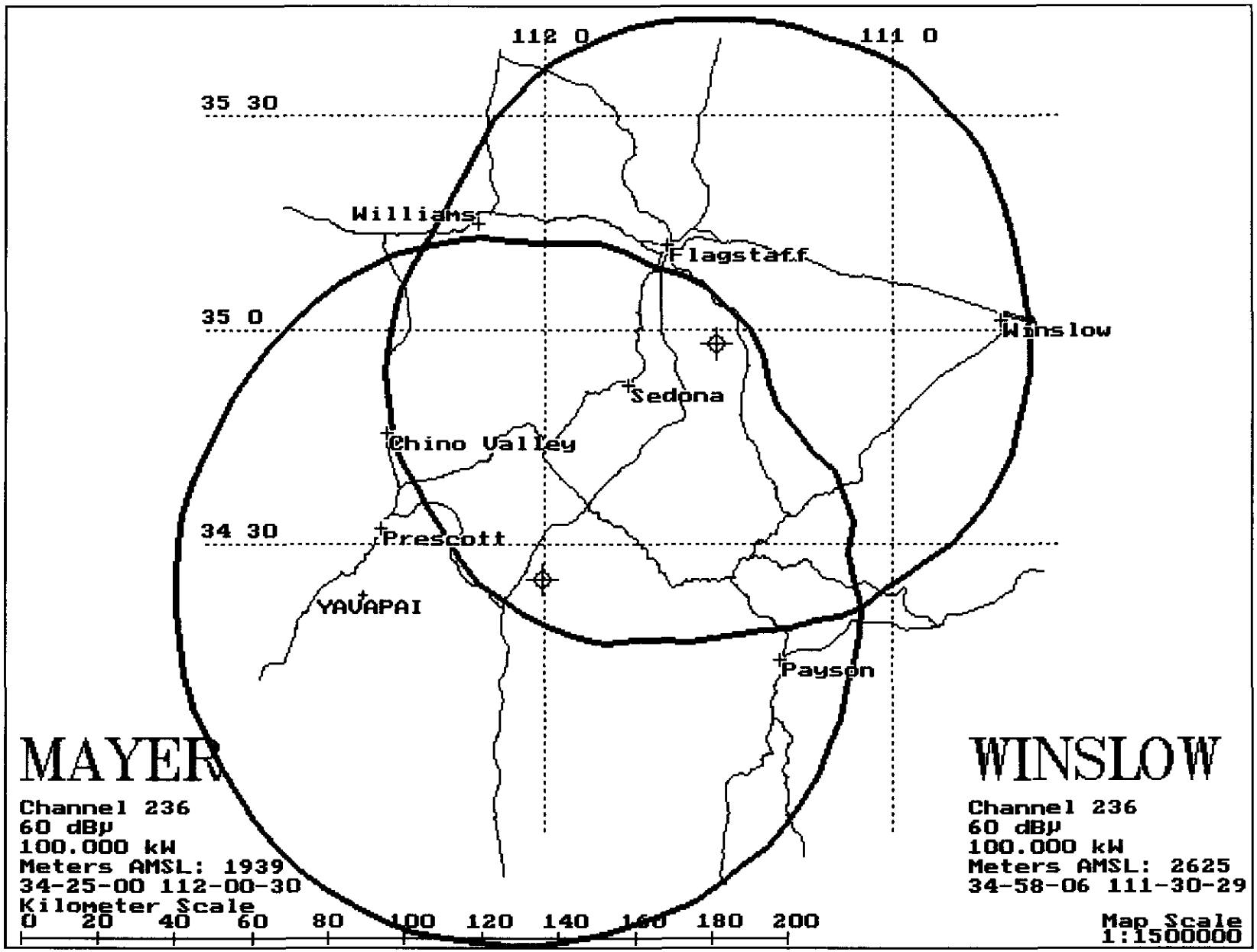
112 0
111 0
35 30
35 0
34 30
Williams
Flagstaff
Winslow
Sedona
Chino Valley
Prescott
YAVAPAI
Payson
MAYER
Channel 236
60 dBµ
100.000 kW
Meters AMSL: 1939
34-25-00 112-00-30
Kilometer Scale
0 20 40 60 80 100 120 140 160 180 200
WINSLOW
Channel 236
60 dBµ
100.000 kW
Meters AMSL: 2625
34-58-06 111-30-29
Map Scale
1:1500000

EXHIBIT E14

CERTIFICATE OF SERVICE

I, Lisa M. Balzer, a secretary in the law firm of Shook, Hardy and Bacon, do hereby certify that I have on this 23rd day of August, 1999 caused to be mailed by first class mail, postage prepaid, copies of the foregoing "**COMMENTS AND ALTERNATE PROPOSALS**" to the following:

* Ms. Nancy V. Joyner
Federal Communications Commission
Mass Media Bureau
445 12th Street, SW
Room 3-A267
Washington, DC 20554

Station KTTI(FM)
Capstar Royalty II Corporation
600 Congress Avenue
Suite 1400
Austin, TX 78701


Lisa M. Balzer

* HAND DELIVERED